

Internal Assessment Plan (IAP) For Fort Campbell, KY

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1. JUSTIFICATION/AUTHORIZATION

Fort Campbell is committed to a full and sustained performance in compliance with all applicable environmental and natural resource laws and regulations. Internal assessments are one of the most effective tools for understanding regulatory requirements and achieving compliance. Army policy stipulates that all installations will perform an internal assessment annually. Army policy also requires Fort Campbell to develop and implement an Internal Assessment Plan (IAP), which is a systematic, documented, objective, and comprehensive environmental performance review of the installation processes, practices and facilities that is to be completed within a 12-month period.

This IAP is a guide for planning Fort Campbell internal assessments and addresses all applicable environmental performance requirements. Information is compiled from existing sources including plans, permits, inventories, program area managers' knowledge, and practices, as well as owners' knowledge. The information is organized and analyzed in a planning process to create the IAP.

2. PLANNING INTERNAL ASSESSMENTS

2.1 Approach

Fort Campbell's Environmental Auditing System (EAS) Program, comprised of a Program Manager and an Environmental Performance Assessment System (EPAS) Team of auditors, was established to accomplish several goals: (1) to perform multimedia environmental assessments in the installation cantonment area, (2) to identify common trends in any findings, and (3) to prepare reports describing aspects and impacts related to corrective actions or other environmental management issues. At the core of this environmental exercise is the assessment itself. The EAS Program Manager notifies the EPAS Team of the facilities and media to be assessed at a location, the EPAS Team then informs the applicable Program Managers of the impending assessment and invites them to participate in the assessment. All interested parties then proceed with the assessment: Specific Media Program Managers doing their own assessment and the EPAS Team doing an audit of all Site Specific Medias at the location.

2.1.1 Geographic Information System (GIS)

Environmental information pertaining to all Fort Campbell facilities is categorized and entered into the Engineering Division's Building GIS Coverage and Environmental Division's Access database. When a facility is identified for an environmental audit, the databases are queried and all environmental media data available is presented for the EPAS Team's use in performing audits. Maintenance and upkeep of the Environmental Division's Access database is the responsibility of applicable media Program Managers.

2.1.2 Regulatory Directives

The EPAS Team maintains a reference file of applicable environmental regulations; US, Tennessee, Kentucky Team Guidance, US Army Supplements, AR 200-1 and other AR 200 series directives, and applicable Fort Campbell policies. All audit checklists are based on the requirements as defined in these sources and all findings are referenced to the pertinent requirement in the audit reports.

2.2 Locations and Media to be Assessed

The priority for environmental media audits are the identified federal, state and local regulated-site locations and media as found on the GIS and Access databases. The media and regulations that are involved are: (asterisks indicate those media that are exempt from auditing at the present time)

Code	Media
AE	Air Emissions Management
AS	Asbestos
CR	Cultural Resources
EI	Environmental Impacts-NEPA
HM	Hazardous Material Management
HW	Hazardous Waste
IR *	Installation Restoration Program
LP	Lead-Based Paint
NO *	Environmental Noise
NR *	Natural Resources Management
PB	Polychlorinated Biphenyls (PCBs)
PE	Pest Management
PM	Environmental Program Management
PO	Petroleum, Oils and Lubricants (POLs)
PP	Pollution Prevention
RA	Radon
ST	Storage Tank Management
SW	Solid Waste Management
WM *	Waste Munitions
WQ	Water Quality Management
WW	Wastewater Management

2.3 Program Management Requirements

2.3.1 Required Audits

In accordance with Army policy AR200-1 an environmental internal audit of applicable environmental media must be performed. To meet this requirement, Fort Campbell will perform on-going random sampling-audits of environmental media.

2.3.2 Audit Priorities

Priorities are established based on requirements of program-specific regulatory directives; US, Tennessee, Kentucky Team Guidance, US Army Supplements, AR 200-1 and other AR 200 series directives, and applicable Fort Campbell policies.

2.3.3 Frequency of Audits

Both media-specific and multi-media audits are performed in accordance with the requirements of program-specific regulatory directives with the following priorities: Regulatory requirements (US, Tennessee, Kentucky, US Army Supplements, AR 200-1 and other AR 200 series directives), Permitted sites (construction sites, sink holes, boiler plans) and Standards (media specific management plans, site specific spill plans, selected Best Management Practices).

2.3.4 Schedule

The minimum frequency of media-specific audits is based on the applicable directive. Additional audits by the EPAS Team are scheduled randomly among facilities and media.

2.4 Roles and Responsibilities

The implementation of the IAP is the responsibility of the media Program Manager and the EPAS Team, as described below.

2.4.1 Multi-Media

Multi-media environmental audits are carried out by the target media's Program Manager and the EAS Program.

2.4.1.1 Program Manager

Regulatory compliance that can be verified by a review of office-held records, Federal and state issued permits or other written documentation of accomplishment, are self-audited and the responsibility of the specific media's Program Manager. In addition, each Program Manager, including the EAS Program Manager, is required to perform an annual audit of Program accomplishments using EPAS Team Guidance.

2.4.1.2 EAS Program

EAS Program will perform multimedia environmental assessments in the installation cantonment area, to identify findings, prepare reports describing those findings, and forward those reports to the appropriate Program Manager for corrective action

2.4.2 Program-Specific

The Program manager will perform audits as well as direct support contractors staff in scheduled field audits. Regulatory compliance and verification that is measured in the field is the responsibility of the EAS Program.

3. IMPLEMENTATION

3.1 Multi-Media

Performance of multi-media environmental audits are structured and organized to meet the requirements of regulatory compliance in a timely manner. This requires working within established parameters towards the common goal of compliance. The Environmental Division has established the following sequential steps as the path to this goal:

- Utilizing the Engineering Division's Building GIS Coverage and Environmental Division's Access database, the EAS Program Manager notifies the EPAS Team of the location and media to be assessed at that location.
- The EPAS Team informs the applicable Program Managers of the impending assessment and invites them to participate in the assessment.
- All interested parties proceed with the assessment.
 - Program Managers perform a self-audit of office-held records utilizing the EPAS team guidance supplied by the EAS Program Manager, (Federal and state issued permits and other directives that provide paperwork verification). All findings are reported back to the EAS Program Manager to be included in the ICAP report.
 - EPAS Team performs environmental audits of the same entities but in the field. Some field audits may require a more technically oriented auditor which may be brought in from the specific program's staff of support staff.
- At the conclusion of the audit, both parties submit their reports, and exchange a copy of the report with the other party. This process is discussed further in Section 4 of this document.

3.2 Program Specific

On a schedule directed by the specific Program Manager, but independent of the Multi-Media audits, the Program-specific auditors perform their audits, usually in the form of inspections. Their reports will also be shared with the EAS Program. The purpose and processes of these reports are discussed further in Section 4 of this document.

3.3 Environmental Assistance

The pilot EAS program assures quality management of existing Fort Campbell environmental programs by identifying and monitoring changes in military unit structure and reflecting these changes within existing Environmental Division programs.

3.4 Sustainable Installation Management System (SIMS)

SIMS document #260 defines how all SIMS internal audits will be conducted to maintain conformance with the ISO 14001 Standard for Environmental Management Systems.

4. CORRECTIVE/PREVENTATIVE ACTION

4.1 Installation Corrective Action Plan

4.1.1 Finding Results

Audit results are entered into the Installation Corrective Action Plan (ICAP), a multi-column document used to record, assess, assign responsibility, and correct negative findings. Each finding is classified according to finding severity. The classifications are:

Class I	Current noncompliance with a Federal, State or local environmental regulation, permit, compliance agreement, consent order or Notice of Violation (NOV).
Class II	Indicates future non-compliance with a Federal, State or local environmental regulation, permit, compliance agreement, consent order. Typically used in complying with a future regulatory deadline or meeting annual requirements (such as testing or training).
Class III	Indicates either non-compliance with Army regulations or DOD Directives, or a recommended good management practice in the absence of specific Federal, State or local regulatory requirements.
No Finding	No Regulatory findings at the site.
Positive	Indicates that the installation has surpassed the regulatory requirements or that the installation has been proactive in meeting the requirements or improving environmental programs.

4.1.2 Tracking

Findings are also entered into the Environmental Division's ICAP Access database. This software package is available for the Program Managers, Branch Chiefs, Division Chief and other concerned parties to use as a real time tool for addressing applicable environmental issues.

4.1.3 Reporting/Management Review

The EPAS Team performs the audits and records audit findings in the applicable format. The ICAP is forwarded to the EAS Program Manager for review, once approved, it is sent to the Compliance Branch Chief for review and then to the Environmental Division Chief. This report is also reviewed at the EQCC meetings

4.1.4 Documentation

The ICAP summary is presented at the annual EQCC meeting by the Environmental Division Chief. The primary data requested and made available consists of the number of findings and their classification.

4.1.5 After Action Reports (AAR)

Timely notification of negative findings is crucial to the success of the EAS Program. The EPAS Team shall notify the EAS Program Manager either verbally or by using the ICAP form (if tracking is required) of a negative finding.

4.1.5.1 EAS Program Manager

The EAS Program Manager shall notify the Specific Media Program Managers, as soon as possible after a negative finding is made.

4.1.5.2 Specific Media Program Managers

Specific Media Program Managers shall take whatever action is needed to correct negative findings. Actions taken or to be taken are recorded on the ICAP Report form and the Program Manager is notified of the finding. The form is returned to the EAS Program Manager who enters the information on the Internal Corrective Action Report (ICAP).

4.1.5.3 Monthly Review of the AAR

All findings are to be entered into the Internal Corrective Action Plan (ICAP) and will be reviewed on a monthly basis, by all interested parties.

4.2 Program Corrective/Preventative Action

Program Managers will correct negative findings from: self audits, Program Specific audits or EPAS Team multi-media audits.

5.0 MANAGEMENT REVIEW/EVALUATION

All findings; Class I, II or III; No finding and Positive finding are entered into the ICAP. The ICAP will also indicate which findings have been closed and which ones remain open. The ICAP is reviewed by management.

5.1 EQCC Review

In accordance with Army policy an ICAP summary is reviewed and utilized by the Environmental Quality Control Committee (EQCC) as a tool to measure environmental compliance and performance.

5.2 SERO Certification

Following the EQCC review of the ICAP a certification letter will be forwarded to the Southeast Region Office (SERO) indicating that the annual requirement for an internal assessment has been completed. This certification letter will be routed for signature by the Chairperson of the EQCC which has typically been the Assistant Division Commander (Support) or the Garrison Commander. Once signed the certification letter becomes a part of this report.

Approved: _____
RONDAL G. BALLARD
Chief, Environmental Division

Dated: _____

Approved: _____
JAMES F. DUTTWEILER
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Dated: _____

